

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

IN RE:
RALPH MATTHEWS HALL

DEBTOR(S)

CASE NO. 20-03688-dd
CHAPTER 7

RESPONSE TO MOTION TO SELL

COMES NOW, Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as Owner Trustee of CSMC 2019-RPL3 Trust, (herein, “Creditor”) by and through undersigned counsel, and hereby responds to the Motion to Sell [Doc. 30] filed on December 9, 2021 and in support thereof, shows unto the Court as follows:

1. On or about December 9, 2021, the Trustee filed a Motion to Sell Property [Doc. 30] (herein, the “Motion”) requesting approval from this Court for the private sale of certain real property located 192 Moonstone Ct, Port Orange, Florida 32129 (herein, the “Real Property”).
2. The Real Property is subject to a Mortgage held by Creditor. The obligation secured by the Mortgage (herein, the “Obligation”) remains outstanding.
3. Creditor does not oppose the relief sought by the Motion conditioned upon the express provision that Creditor must receive payment in full of contractual balance of the Obligation at the closing of the sale of the Real Property. Such closing must be preceded by a proper and updated payoff quote provided by Creditor.

WHEREFORE, based upon the foregoing, Creditor respectfully requests that any order permitting the sale of the Real Property condition the same upon the payment in full of contractual balance of the Obligation at the closing of the sale of the Real Property and for any other relief the Court deems just and proper.

This the 23rd day of December, 2021.

/s/ Gentry Collins
Gentry Collins (Bar No. 13219)
Attorney for Creditor
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CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury that he/she is over eighteen (18) years of age and that the RESPONSE TO MOTION TO SELL in the above captioned case were this day served upon the below named persons by electronic service and/or mailing, postage prepaid, first class mail a copy of such instrument to each person(s), parties, and/or counsel at the addresses shown below:

RALPH MATTHEWS HALL
1673 BEES CREEK RD
RIDGELAND, SC 29936

Philip Fairbanks
1214 King Street
Beaufort, SC 29902
Served via CM/ECF

Kevin Campbell
P.O. Box 684
Mount Pleasant, SC 29465
Served via CM/ECF

This the 23rd day of December, 2021.

/s/ Gentry Collins
Gentry Collins (Bar No. 13219)
Attorney for Creditor
8757 Red Oak Blvd, Ste 150
Charlotte, NC 28217
704-369-0676 x3016
scbkr@brockandscott.com